

Graham M. Sweitzer, OSB #025866

graham.sweitzer@harrang.com

HARRANG LONG P.C.

111 SW Columbia St.,

Suite 950

Portland, OR 97201

Telephone: (503) 242-0000

Facsimile: (541) 686-6564

Joel A. Ready

joel@cornerstonelaw.us

Dominic Mayle, *pro hac vice* forthcoming

dominic@cornerstonelaw.us

Cornerstone Law

519 Walnut Street

Reading, PA 19601

Telephone: 610-926-7875

Facsimile: 484-930-0054

Of Attorneys for Defendant TEACHERS COUNCIL, INC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

JANE DOE AND JOHN ROE,

Plaintiffs,

vs.

TEACHERS COUNCIL, INC,

Defendants.

Case No. 3:23-CV-1747

**DEFENDANT TEACHERS
COUNCIL, INC.'S AMENDED
AND UNOPPOSED FIRST
MOTION FOR EXTENSION OF
TIME**

LR 7-1 CERTIFICATION

Pursuant to LR 7-1(a), counsel for Defendant Teachers Council, Inc. ("Teachers Council") conferred with counsel for Plaintiffs and confirmed that Plaintiffs consent to Teachers

Council's request for an extension of time, until February 2, 2024, to respond to Plaintiffs' Complaint.

MOTION FOR EXTENSION OF TIME

Without waiver or prejudice as to any defense, and pursuant to FRCP 6(b)(1)(A) and LR 16-3(a), Teachers Council moves for an order extending the deadline to file a response to Plaintiffs' Complaint. Teachers Council is returning a signed Waiver of Service form to council for Plaintiffs today. Plaintiffs' request for said Waiver was sent on November 28, 2023. That would normally result in the deadline for Teachers Council to respond to Plaintiffs' Complaint being January 29, 2024. With Plaintiffs' consent Teachers Council is hereby requesting an extension of time to file a response to and including February 2, 2024.

Good cause exists to extend Teachers Council response deadline as its counsel is working diligently to evaluate and prepare and complete the response to Plaintiffs' complaint while also attending to hearings and deadlines in other matters. Teachers Council's counsel has employed an effective use of time but, due to both professional and personal conflicts, needs more time to file a response to Plaintiffs' Complaint.

This requested extension is made in good faith, is not sought for any improper purpose, and is not intended to cause undue delay. It is expected to have an impact on any existing deadlines, setting or schedules. This motion replaces Teachers Council's pending Motion for Extension, so appears to still be considered its first request for an extension of time to respond to the Complaint.

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For the reasons stated above, Teachers Council respectfully requests an order extending the deadline for Teachers Council to respond to Plaintiffs' Complaint to February 2, 2024.

DATED this 22nd day of December, 2023.

HARRANG LONG P.C.

By: s/ Graham M. Sweitzer
Graham M. Sweitzer, OSB #025866

Of Attorneys for Defendant TEACHERS
COUNCIL, INC

CERTIFICATE OF SERVICE

I certify that on December 22, 2023, I served or caused to be served a true and complete copy of the foregoing **DEFENDANT TEACHERS COUNCIL, INC.'S MOTION FOR EXTENSION OF TIME** on the party or parties listed below as follows:

- ☒ Via CM / ECF Filing
- ☐ Via First Class Mail, Postage Prepaid
- ☒ Via Email
- ☐ Via Personal Delivery

Alex Boon, OSB #195761
alex@nwjp.org
Corinna Spencer-Scheurich, OSB #130147
corinna@nwjp.org
Northwest Workers' Justice Project
310 SW Fourth Avenue, Suite 320
Portland, OR 97204
Telephone: 503-525-8454
Fax: 503-946-3029

Attorneys for Plaintiffs

HARRANG LONG P.C.

By: s/ Graham M. Sweitzer
Graham M. Sweitzer, OSB #025866

Of Attorneys for Defendant TEACHERS
COUNCIL, INC